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9	IMITED STATES DA	ANKRUPTCY COURT					
10	NORTHERN DISTRI	CT OF CALIFORNIA					
11	SAN FRANCIS	SCO DIVISION					
12	In re:	Bankruptcy Case No. 19-30088 (DM)					
13	PG&E CORPORATION,	Chapter 11					
14	- and -	(Lead Case) (Jointly Administered)					
15	PACIFIC GAS AND ELECTRIC	REORGANIZED DEBTORS' REPORT ON					
16	COMPANY,	RESPONSES TO EIGHTEENTH THROUGH TWENTY-FOURTH OMNIBUS					
17	Debtors.	OBJECTIONS TO CLAIMS AND REQUEST FOR ORDERS BY DEFAULT AS TO					
18	☐ Affects PG&E Corporation	UNOPPOSED OBJECTIONS					
19	☐ Affects Pacific Gas and Electric Company ☑ Affects both Debtors	[Re: Dkt. Nos. 9263, 9266, 9269, 9272, 9275,					
20	* All papers shall be filed in the Lead Case, No.	9278, 9281]					
21	19-30088 (DM).	Resolving Objections Set for Hearing November 17, 2020 at 10:00 a.m. (Pacific Time)					
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REQUEST FOR ENTRY OF ORDER BY DEFAULT

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PG&E Corporation ("PG&E Corp.") and Pacific Gas and Electric Company (the "Utility"), as debtors and reorganized debtors (collectively, "PG&E" or the "Debtors" or as reorganized pursuant to the Plan (as defined below), the "Reorganized Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the Second Amended Order Implementing Certain Notice and Case Management Procedures, entered on May 14, 2019 [Dkt No. 1996] ("Case Management Order"), that the Court enter orders by default on the following omnibus claims objections (collectively, the "Omnibus **Objections**"): (i) the Reorganized Debtors' Eighteenth Omnibus Objection to Claims (Amended and Superseded Claims) [Docket No. 9263] (the "Eighteenth Omnibus Objection"); (ii) the Reorganized Debtors' Nineteenth Omnibus Objection to Claims (Duplicative Claims) [Docket No. 9266] (the "Nineteenth Omnibus Objection"); (iii) the Reorganized Debtors' Twentieth Omnibus Objection to Claims (Incorrect Debtor Claims) [Docket No. 9269] (the "Twentieth Omnibus Objection"); (iv) the Reorganized Debtors' Twenty-First Omnibus Objection to Claims (Books and Records Claims) [Docket No. 9272] (the "Twenty-First Omnibus Objection"); (v) the Reorganized Debtors' Twenty-Second Omnibus Objection to Claims (Satisfied Claims) [Docket No. 9275] (the "Twenty-Second Omnibus **Objection**"); (vi) the Reorganized Debtors' Twenty-Third Omnibus Objection to Claims (No Liability Claims) [Docket No. 9278] (the "Twenty-Third Omnibus Objection"); and (vii) the Reorganized Debtors' Twenty-Fourth Omnibus Objection to Claims (Plan Passthrough Environmental Claims) [Docket No. 9281] (the "Twenty-Fourth Omnibus Objection").

RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS

The Omnibus Objections seek to disallow and/or expunge the Proof(s) of Claim listed in Exhibit 1 to each Omnibus Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection [Docket Nos. 9265, 9268, 9271, 9274, 9277, 9280, and 9283]. The Omnibus Objections also were supported by the respective declarations of Robb McWilliams [Docket Nos. 9264, 9267, 9270, 9273,

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 9276, and 9279], and, in the case of the Twenty-Fourth Omnibus Objection, the declaration of David Kraska [Docket No. 9282]. The Omnibus Objections, the Notices of Hearing, and the Declarations were served as described in the *Certificate of Service of Andrew G. Vignali*, filed on October 19, 2020 [Docket No. 9320] (the "Certificate of Service"). As further described in the Certificate of Service, on October 9, 2020, each Proof of Claim listed on Exhibit 1 to the Omnibus Objections received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the applicable claim to be disallowed and/or expunged, and (ii) the claim number, claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Omnibus Objections has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution		
Eighteenth Omnibus Objection					
Informal	Rosemount, Inc.	2718 10085	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.		
9351	Asplundh Construction, LLC	7976 17001	Claimant does not oppose disallowance of its Claim as set forth in the Statement of Non-Opposition and Reservation of Rights re Reorganized Debtors' Eighteenth Omnibus Objection to Claims [Docket No. 9351].		
Informal	TRC Master Fund LLC as transferee of B&B Plumbing & Construction Inc.	2733	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.		
Informal	TRC Master Fund LLC as transferee of B&B Plumbing & Construction Inc.	16919	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.		
Informal	VonWin Capital Management, L.P. as transferee of Craig Communications Inc.	1743	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.		

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Docket No.	Claimant	Claim No.	Resolution
Informal	Citigroup Financial Products Inc.	75045	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.
Informal	Citigroup Financial Products Inc. as transferee of Phillips and Jordan, Incorporated	3447	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.
Informal	Marble Ridge TC LP as Transferee of Marble Ridge Master Fund LP	64138	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.
	Nineteenth Om	nibus Object	ion
Informal	Angela Rodgers	31029 56866	The Nineteenth Omnibus Objection is WITHDRAWN with respect to this Claim.
Informal	SPCP Group, LLC	3255 27374	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
9340	Edgar Perry	92615 106158	The Reorganized Debtors' counsel spoke to Claimant by telephone on November 10, 2020, and attempted to explain that the Reorganized Debtors only were seeking to disallow and expunge one of his claims, Claim No. 92615, and that Claim No. 106158 would remain on the claims register subject to further objection. Claimant requested this message be conveyed by United States Mail, which the Reorganized Debtors' counsel did on November 12. If necessary, the Reorganized Debtors are prepared to address the Nineteenth Omnibus Objection with respect to this Claim at the hearing.

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	Docket No.	Claimant	Claim No.	Resolution
2 3 4 5 6	Informal	Burney Forest Products	53844	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
7 8	Informal	Ernie & Sons Scaffolding Inc.	6967	The Reorganized Debtors have reached a settlement of this Claim that moots the Nineteenth Omnibus Objection.
9		Twentieth Omi	nibus Objecti	ion
10 11	Informal	Bestwall, LLC	65587 65524	The Twentieth Omnibus Objection is WITHDRAWN with respect to this Claim.
12 13	Informal	State Farm General Insurance Company	58088 58302	By agreement with Claimant, Claim No. 58088 shall be disallowed and expunged, and Claim No. 58302 shall survive.
14 15 16 17 18 19 20 21 22 23	Informal	Monica Staar	86862 86898	The Reorganized Debtors' counsel emailed Claimant on November 9, 2020, and explained that the Reorganized Debtors are only objecting to one of her claims, Claim No. 86862, asserted against PG&E Corporation. That claim is substantively identical to Claim No. 86898, asserted against Pacific Gas and Electric Company. The Reorganized Debtors have not yet received a response. If necessary, the Reorganized Debtors are prepared to address the Twentieth Omnibus Objection with respect to this Claim at the hearing.
242526	Informal	Gowan Construction Company, Inc.	64156	The Reorganized Debtors have reached a settlement of this Claim that moots the Twentieth Omnibus Objection.
27 28	Informal	Vedder Price P.C.	1227	The Reorganized Debtors have reached a settlement of this Claim that moots the Twentieth Omnibus Objection.

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1	Docket No.	Claimant	Claim No.	Resolution			
	Twenty-First Omnibus Objection						
2 3 4 5 6 7	Informal	Asplundh Construction, LLC	17001	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.			
8 9 10	Informal	Sierra Pacific Industries	2377	The Claimant has confirmed to the Reorganized Debtors that Claim No. 2377 has been satisfied in its entirety. Accordingly, it will be expunged.			
11 12	Informal	W. Bradley Electric, Inc.	67191	The Reorganized Debtors have reached a settlement of this Claim that moots the Twenty-First Omnibus Objection.			
13 14	Informal	Aramark Refreshment Services, LLC	3582	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to			
15 16 17				an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.			
18 19	Informal	McMaster-Car Supply Co.	2362	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to			
20				an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be			
21 22				resolved, it will be continued to the next omnibus hearing, on			
23	Informal	Purnay Farast Praducts	2255	December 15, 2020, at 10:00 a.m.			
24 25	momai	Burney Forest Products	2233	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's			
26				response deadline to December 1, 2020. If the objection cannot be			
27				resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.			
28				December 15, 2020, at 10:00 a.m			

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Docket No.	Claimant	Claim No.	Resolution
Informal	Southwest Research Institute	1787	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
Informal	Burns & McDonnell Engineering Company, Inc.	76752	The Reorganized Debtors have reached a settlement of this Claim that moots the Twenty-First Omnibus Objection.
Informal	Airgas Specialty Products	2175	The Reorganized Debtors have reached a settlement of this Claim that moots the Twenty-First Omnibus Objection.
	Twenty-Second O	mnibus Obje	ection
Informal	CA BTM Energy Storage, LLC	30941	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 29, 2020. If the objection cannot be resolved, it will be continued to the omnibus hearing, on January 12, 2021, at 10:00 a.m.
Informal	CA Energy Storage Holdings, LLC	30944	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 29, 2020. If the objection cannot be resolved, it will be continued to the omnibus hearing, on January 12, 2021, at 10:00 a.m.
Informal	GSA Solar, LLC	31024	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 29, 2020. If the objection cannot be resolved, it will be continued to the omnibus hearing, on January 12, 2021, at 10:00 a.m.
Informal	Global Ampersand LLC	27367	The Reorganized Debtors are attempting to resolve this matter

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Docket No.	Claimant	Claim No.	Resolution
			consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
Informal	Panoramic Investments	1932	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
	Twenty-Third (Omnibus Obje	ction
Informal	Phillips 66 Pipeline LLC	97934	Following consultation with the Claimant, the Reorganized Debtors agreed to revise the proposed order granting the Twenty-Third Omnibus Objection to include the additional language in para. 2 that references MLX Claims.
9352	Asplundh Construction, LLC	97049	Claimant contends that Claim No. 97049 is a Fire Victim Claim as defined in the Plan. Claim No. 97049 thus shall for all purposes b treated and classified as a Fire Victim Claim under the Plan, and shall be fully assumed by, and the sole responsibility of, the Fire Victim Trust and subject to the Channeling Injunction, to be administered, processed, settled, disallowed, resolved, liquidated, satisfied, and/or paid in accordance with the Fire Victim Trust Agreement and the Fire Victim Claims Resolution Procedures. Claimant shall have no further recourse against the Debtors or Reorganized Debtors, as applicable, with respect to Claim No. 97049 or the Fire Victim Claim asserted therein.
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1		Docket No.	Claimant	Claim No.	Resolution
2					defined in the Plan. Claim No. 97051 thus shall for all purposes be
3					treated and classified as a Fire
3					Victim Claim under the Plan, and shall be fully assumed by, and the
4					sole responsibility of, the Fire
5					Victim Trust and subject to the Channeling Injunction, to be
6					administered, processed, settled,
					disallowed, resolved, liquidated,
7					satisfied, and/or paid in accordance with the Fire Victim Trust
8					Agreement and the Fire Victim
9					Claims Resolution Procedures. Claimant shall have
10					no further recourse against the
10					Debtors or Reorganized Debtors, as applicable, with respect to
11					Claim No. 97051 or the Fire
12					Victim Claim asserted therein.
13	-		Twenty-Fourth O	mnibus Obje	ection
		Informal	California State Agencies		Following consultation with the Claimant, the Reorganized Debtors
14					agreed to revise the proposed order
15					granting the Twenty-Fourth
16					Omnibus Objection to include the additional language in paragraph 2
17					that references the Plan's treatment
1 /					of Environmental Claims and Environmental Performance
18					Obligations.
19		Informal	Federal Agencies		Following consultation with the
20					Claimant, the Reorganized Debtors
					agreed to revise the proposed order granting the Twenty-Fourth
21					Omnibus Objection to include the
22					additional language in paragraph 2 that references the Plan's treatment
23					of Environmental Claims and
24					Environmental Performance Obligations.
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DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the Reorganized Debtors

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- 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objections except as described herein.
 - 3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of Orders disallowing and expunging the Proofs of Claims listed in the column headed "Claims to be Disallowed and Expunged" in **Exhibit 1** to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Omnibus Objections, except as otherwise discussed above.

Dated: November 13, 2020 KELLER BENVENUTTI KIM LLP

By: <u>/s/ Dara L. Silveira</u>
Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors

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